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UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

SEP 14 2000

at 1 o'clock and 40 min. PM
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 00-00329 HG
)	
Plaintiff,)	SUPERSEDING INDICTMENT
)	
v.)	[18 U.S.C. §§ 371, 1028]
)	
BINH LIEN VU NGUYEN,	(01))	
aka "Mia,")	
TROY BYRD,	(02))	
RAPHAEL MORALES,	(03))	
ANTHONY M. AJIMINE,	(04))	
aka "Angel,")	
)	
Defendants.)	
)	

SUPERSEDING INDICTMENT

THE CONSPIRACY AND ITS OBJECTS

The Grand Jury charges:

1. From a time unknown to the Grand Jury and continuing to
on or about July 31, 2000, in the District of Hawaii, BINH LIEN

ATTEST: A True Copy
WALTER A. Y. H. CHINN
Clerk, United States District
Court, District of Hawaii
By *[Signature]*
Deputy

VU NGUYEN, aka "Mia," TROY BYRD, RAPHAEL MORALES, ANTHONY M. AJIMINE, aka "Angel," defendants herein, did willfully and knowingly combine, conspire, confederate, and agree together and with each other, and with persons both known and unknown to the Grand Jury, to commit offenses against the United States, to wit:

(a) to knowingly and without lawful authority, produce in and affecting interstate commerce, five or more false identification documents, to wit: state identification cards, in violation of Title 18, United States Code, Section 1028(a)(1).

(b) to knowingly transfer in and affecting interstate commerce false personal identification cards, to wit: false state identification cards, knowing that such personal identification cards were produced without lawful authority, in violation of Title 18, United States Code, Section 1028(a)(2).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that the defendants would solicit individuals, primarily underage male and female tourists, and for a fee provide them with false state identification cards that would allow them to enter clubs and other establishments that sell alcoholic beverages. The business was conducted under the name "Fantasy Photo IDs." The false state identification cards would contain the photo of the underage individual with information that would establish their age as 21 or greater.

False state identification cards would also be produced for persons over the age of 21. These false state identification cards were produced in Hawaii without the lawful authorization of the state named on the card.

3. It was further part of the conspiracy that the defendants would take a digital photograph of the purchaser and enter it into a computer. They would receive the information to be contained on the false state identification from the purchaser. They would then pull up a computer stored template of the state identification selected by the purchaser and place within it the information provided. The photograph of the purchaser was then added to the template and it was printed. The template would be signed by the purchaser and it would be trimmed and then laminated.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants, BINH LIEN VU NGUYEN, aka "Mia," TROY BYRD, RAPHAEL MORALES, ANTHONY M. AJIMINE, aka "Angel" and their co-conspirators, committed diverse overt acts, in the District of Hawaii, among which were the following:

a. On or about April 18, 2000, BINH LIEN VU NGUYEN, aka "Mia," had an undercover police officer complete an information sheet which was to be used to complete the false identification card.

b. BINH LIEN VU NGUYEN, aka "Mia," collected \$50.00 from the officer as payment for the false identification card.

c. On or about April 18, 2000, John Doe #A, took a digital photo of the undercover police officer and entered it along with the information received from the undercover police officer into a computer and produced two false Illinois state identification cards.

d. BINH LIEN VU NGUYEN, aka "Mia," handed the undercover officer two false Illinois state identification cards.

e. On or about July 31, 2000, John Doe #1, solicited two special agents asking them if they wanted fake IDs.

f. On or about July 31, 2000, TROY BYRD, took a digital photo of a special agent and used a computer to insert this into a false Colorado state identification card.

g. TROY BYRD worked behind the counter of Fantasy Photo ID and collected and counted money received from customers, and instructed them in the completion of the information sheets.

h. BINH LIEN VU NGUYEN, aka "Mia," provided an undercover special agent with six additional forms for identifications and took a digital photo of the special agent who had ordered six false identifications.

i. ANTHONY M. AJIMINE, aka "Angel," took the digital camera that had been used by BINH LIEN VU NGUYEN, aka "Mia," to photograph the special agent and plugged it into the computer.

j. ANTHONY M. AJIMINE, aka "Angel," loaded the photo of the special agent into the computer and then produced 12 state identification cards which were handed to another individual, who then gave them to the special agent.

k. On or about July 31, 2000, RAPHAEL MORALES placed a form before the undercover special agent and directed him in its completion.

l. On or about July 31, 2000, RAPHAEL MORALES brought two juveniles to the Fantasy Photo kiosk and provided them with the form to obtain a false identification card.


All in violation of Title 18, United States Code, Section 371.

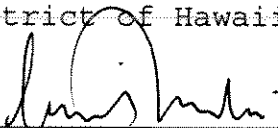
DATED: Sep 14, 2000, Honolulu, Hawaii.

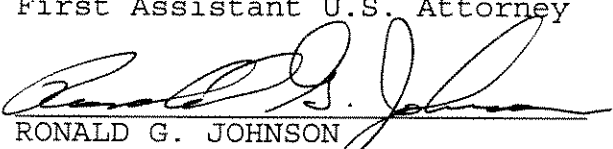
A TRUE BILL

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FOREPERSON, GRAND JURY


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United States v. Binh Lien Vu Nguyen, aka "Mia," et.al.
Cr. No. 00-00329 HG
"Superseding Indictment"